



THE LAW OFFICE OF
AVRAM E. FRISCH LLC

New Jersey Office
1 University Plaza
Suite 119
Hackensack, NJ 07601

New York Office
150 Broadway
Suite 900
New York, NY 10038

Avram E. Frisch Esq. - Admitted in NY and NJ. Mail to NJ address.

MEMO ENDORSED

July 11, 2019

Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

Via Electronic Filing

Re: Vertime v. New Dover Group Ltd. 7:17-cv-03844(KMK)

Dear Judge Karas:

This firm represents Chaim Fischer and his companies. I write to notify the Court that Defendant, New Dover Group has filed for bankruptcy protection under Chapter 11 of the bankruptcy code under Case No. 19-23266. As the Court is aware, Plaintiff's motion for contempt and sanctions is pending and my clients' opposition is due tomorrow, July 12, 2019. We believe that this action and the pending motion are subject to the automatic stay of 11 U.S.C. § 362(a)(1) and (6) as the plain language of the statute prohibits the continuation of this action. While my client is prepared to file its opposition, I request the Court's guidance in order to avoid any inadvertent violation of the automatic stay while still protecting my clients' interests in this proceeding. As this is a time sensitive matter, I am available for a phone conference at any time today or tomorrow.

Very truly yours,

Avram E. Frisch

Avram E. Frisch

The case is stayed unless and until the Bankruptcy court resolves the Chapter 11 filing or rules otherwise.

Cc: Chaim Fischer (via email)
Todd Michaelis (via ECF)
Jonathan Ross (via ECF)

So order today
MK 7/11/19